



American Telecommunications Certification Body Inc.  
6731 Whittier Ave, McLean, VA 22101

September 17, 2008

RE: FCC ID: VWPKENWIN00004\_ATCB006774

Attention:

I have a few comments on this Application. Please note that further comments may arise in response to answers provided to the questions below. **Please do not submit confidential information in a response letter. Confidential information should be uploaded to the Server in the proper application folder.**

1. Please note that DSS is not an appropriate equipment code for this type device. DSS is used for FHSS devices. These type devices are digital transmission systems or DTS. Please correct the 731 form to show the correct equipment code.
2. Please note that while you have provided a system level block diagram, you have not provided the required block diagram for the transmitter. Please provide a block diagram for the WiFi transmitter that is in accordance with part 2.1033.
3. Please provide internal photos of the transmitter portion of the device. Please show top and bottom of the transmitter module.
4. Please explain what "will restitute receiver" means.
5. Please note that the block diagram in the operational description indicates a Bluetooth rf port. Please explain if there is a Bluetooth capability in this device as well.
6. Please note that the 731 form says the output of the transmitter is 112mW (20.5dBm), but the test report says the output is 22.5dBm (178mw). Please note that conducted power does not include antenna gain. This means that the highest conducted power should be  $19.91 + 0.6$  or 20.51dBm. Please correct the report to show the conducted power and not the eirp power using the antenna gain.
7. Please note that you have provided MPE for this device however, this device appears to be a portable device and is only approximately 2 inches by 3 inches in size. Also, the manual clearly states that this is a "Portable Internet player". As this device is a portable device it is not consider mobile rf category. Please perform the required SAR for body worn configuration.
8. From the plotted data in the band edge plots etc it appears that the device may be close to the 54dBuV limit in the restricted band at 2483.5MHz. Please confirm and provide a radiated emissions measurement for the restricted band at 2483.5MHz.
9. Please note that the external photos show the device uses a USB connection. Also, item 6 on page 6 of the manual states that music and video transfers are possible over the USB cable. However, there is no indication in the application in either the label drawing or attestation letter that 15B computer peripheral requirements have been addressed. Please provide an attestation that the DoC as to how the part 15B will be properly addressed I accordance with FCC rules or please submit test data and a request for 15B certification.
10. Please note that depending on the responses to the above, there may be further comments and questions on this application.

Dennis Ward

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The items indicated above must be submitted before processing can continue on the above referenced application. Failure to provide the requested information may result in application termination. Except as described in §0.459, correspondence and responses should be considered part of the permanent submission and may be viewed from the Internet after a Grant of Equipment Authorization is issued.

Please do not respond to this correspondence using the email reply button. In order for your response to be processed expeditiously, you must submit your documents through the AmericanTCB.com website. Also, please note that partial responses increase processing time and should not be submitted.

Any questions about the content of this correspondence should be directed to the sender.